

UNITED STATES DISTRICT COURT

for the
Northern District of Georgia

Suzanne Greene

Plaintiff

v.

Tyler Technologies, Inc.

Defendant

Civil Action No. 1:19-cv-01338-AT

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: Paula B. McKeeby

(Name of person to whom this subpoena is directed)

☒ **Testimony:** **YOU ARE COMMANDED** to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: Dentons US, LLP
303 Peachtree Street, NE, Suite 5300
Atlanta, GA 30308

Date and Time:
10/9/2019 at 3:00 PM

The deposition will be recorded by this method: court reporter

☒ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

Please see Attachment A

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 9/24/2019

CLERK OF COURT

OR

/s/ Matthew W. Herrington

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Suzanne Greene, who issues or requests this subpoena, are:

Matthew W. Herrington; 101 Marietta Street, Suite 2650, Atlanta, GA 30303; 404-979-3150; matthew.herrington@dcbflegal.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

ATTACHMENT A

All categories of documents enumerated below should be limited to documents created prior to April 2019.

- (1) Any written or electronic communications between you and Tyler Technologies, Inc. regarding the classification of implementation consultants as exempt or non-exempt from the FLSA's maximum hour requirements.
- (2) Any other documents reflecting or relating to the any advice given by you to Tyler Technologies, Inc. about the classification of implementation consultants as exempt or non-exempt from the FLSA's maximum hour requirements.
- (3) All notes or other documents relating to any investigation into the job duties of Tyler Technologies, Inc. implementation consultants and their status as exempt or non-exempt from the FLSA's maximum hour requirements.
- (4) All billing records reflecting work performed on behalf of Tyler Technologies relating to the compliance with the FLSA and investigation into its obligations to implementation consultants under the FLSA.
- (5) All communications between you and Tyler Technologies regarding the job duties of implementation consultants and/or project managers.
- (6) All notes or other documents reflecting the substance of communications between you and Tyler Technologies regarding the job duties of implementation consultants and/or project managers.